

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

RECEIVED
JUL 28 2006
CLERK U.S. DISTRICT COURT
ANCHORAGE, ALASKA

M. CELESTE BARRAS

Plaintiff,

vs.

HEALTHSOUTH MEDICAL CLINICS
OF ANCHORAGE, LLC & U.S
HEALTHWORKS HOLDING CO., INC.,

Defendants.

Case No A05-0174-CV (JWS)

Plaintiff's Opposition to Defendant's Motion for Attaching Rule 37.(b) (2) and D. Ak 37.1 (a) -(b)

Plaintiff has not willful withheld any information from defendants.

Defendants are obstructing justice with the advantage of their legal understanding of Rules and

Procedures and soliciting to have the case dismissed for the plaintiff's lack of understanding these Rules
and Procedures

Furthermore when defendant met face to face with plaintiff June 22, 2006 defendant was well aware that
the plaintiff was employed full-time with Alaska Regional Hospital and an obligation to the current
employer. Defendant is using excessive force and power that was never exhibited with either of the former
attorney's which possessed the same education and experience with the legal system as the defendant. At
which time the plaintiff also informed the defendant she didn't want to create another employment
situation as too much time away from work will again cause the loss of a employment, stemming from the
same circumstances; the disabled child. That is what this lawsuit is about.

The previous attorneys both willing withdrew from the case due to the lack of financing the plaintiff was
able to provide.

We agreed to mediation, which is set for August 3rd, 2006 at 9:00 AM.

MARNA CELESTE BARRAS-ROHAN
CITIZEN OF THE UNITED STATES
160 Ocean Park Drive
Anchorage, Alaska 99515-3401
PHONE & FAX: (907) 336-1960 CELL: (907) 250-4817

M. Celeste Barras-Rohan
Citizen of The United States
Born Resident of Alaska
160 Ocean Park Drive
Anchorage, Alaska 99515
Telephone & Fax: (907) 336-1960
Cell: (907) 250-4817

DATED at Anchorage, Alaska this 28th day of July 2006

M. Celeste Barras
160 Ocean Park Drive
Anchorage, Alaska 99515

By: M. Celeste Barras-Rohan
Marna Celeste Barras-Rohan

Certificate of Service

This is to certify that on this 28th day of
July 2006, a true and correct copy of the
foregoing was mailed, to:

TURNER & MEDE, P.C.
Attorneys for defendants HealthSouth
Medical Clinics of Anchorage, LLC and
U. S. Healthworks Holding Company, INC.
1500 West 33rd Avenue, Suite 200
Anchorage, Alaska 99503-3502
Telephone: (907) 276-3963
Fax: (907) 277-3695

MARNA CELESTE BARRAS-ROHAN
CITIZEN OF THE UNITED STATES
160 Ocean Park Drive
Anchorage, Alaska 99515-3401
PHONE & FAX: (907) 336-1960 CELL: (907) 250-4817